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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

TWIN BEAUTY LLC a/k/a KOOL KRAFTS LLC

Plaintiff,

v.

NR INTERACTIVE LLC, and NIR RODRIGUEZ,

Civil Action No. 24 - cv - 7412

**SUBMISSION ARGUMENT  
REQUESTED**

**NOTICE OF NR INTERACTIVE LLC AND NIR RODRIGUEZ'S MOTION TO  
DISMISS PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE that as soon as it may be heard, in the courtroom of the Honorable Rachel P. Kovner, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East Brooklyn, New York 11201, with submission argument to be held on a date and time to be designated by the Court, Defendants NR Interactive LLC and Nir Rodriguez ("Defendants") will and hereby does move this Court for an order dismissing Plaintiff's complaint against Defendants for failure to establish proper jurisdiction and for failure to state a claim under Federal Rule of Civil Procedure 12(b)(1), 12(b)(2), 12(b)(3), and 12(b)(6).

Defendants' motion is based on this Notice of Motion; Defendant's Memorandum in Support of its Motion to Dismiss Plaintiff's Complaint; the accompanying Declaration of Nir Rodriguez in Support of Defendants' Motion to Dismiss Plaintiff's Complaint and Exhibit 1 attached thereto; any arguments of counsel; and any other such materials properly considered by the Court at any hearing on this motion.

Date of Service: November 8, 2024

Respectfully submitted:

By: /s/ Nir Rodriguez

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2024, the foregoing document was filed with the Clerk of the Court and served via CM/ECF in accordance with the Federal Rules of Civil Procedure, and/or the Eastern District's Local Rules, and/or the Eastern District's Rules on Electronic Service upon the following parties and participants:

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Dated: November 8, 2024

By: /s/ Nir Rodriguez

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***Pro Se For Defendants***